

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : SUPERSEDING INDICTMENT
:
- v. - : S1 19 Cr. 752 (JMF)
:
CHRISTOPHER ANSAH, :
:
Defendant. :
:
----- X

COUNT ONE

(Conspiracy to Export, Transport, and Possess Stolen Motor Vehicles)

The Grand Jury charges:

1. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, the exportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 553(a)(1), the transportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 2312, and the possession of stolen motor vehicles, in violation of Title 18 United States Code, Section 2313.

2. It was a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown,

would and did knowingly export and attempt to export motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 553(a)(1).

3. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did transport, in interstate and foreign commerce, motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312.

4. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, CHRISTOPHER ANSAH, the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about May 14, 2018, ANSAH loaded stolen motor vehicles, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

b. On or about November 2, 2018, ANSAH oversaw the loading of a stolen motor vehicle, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Exportation of Stolen Motor Vehicles)

The Grand Jury further charges:

6. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did export and attempt to export motor vehicles, knowing the same to have been stolen, to wit, ANSAH exported and attempted to export stolen cars by placing them in shipping containers bound for West Africa.

(Title 18, United States Code, Sections 553(a)(1) and 2.)

COUNT THREE

(Transportation of Stolen Motor Vehicles)

The Grand Jury further charges:

7. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did transport in interstate and foreign commerce motor vehicles,

knowing the same to have been stolen, to wit, ANSAH transported and aided and abetted the transportation of stolen motor vehicles from the Bronx to New Jersey, which motor vehicles were bound for West Africa.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT FOUR

(Possession of Stolen Motor Vehicles)

The Grand Jury further charges:

8. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, to wit, ANSAH received and possessed in New York State motor vehicles stolen from outside New York State and stored or concealed them in shipping containers bound for West Africa, knowing those vehicles were stolen.

(Title 18, United States Code, Sections 2313 and 2.)

COUNT FIVE

(Submitting False Export Information)

The Grand Jury further charges:

9. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of

New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did knowingly submit false and misleading export information through the Automated Export System ("AES"), to wit, ANSAH caused the submission, through the AES, of false and misleading information about the nature and value of cargo inside shipping containers bound for West Africa.

(Title 13, United States Code, Section 305, and Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATIONS

10. As a result of committing the offenses alleged in Counts One, Three, and Four of this Indictment, CHRISTOPHER ANSAH, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

11. As a result of committing the offense alleged in Count Two of this Indictment, CHRISTOPHER ANSAH, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(F) and 982(a)(5), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission

of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

12. As a result of committing the offense in Count Five of this Indictment, CHRISTOPHER ANSAH, the defendant, shall forfeit to the United States, pursuant to Title 13, United States Code, Section 305(a)(3), the following: (a) any and all interest in, security of, claim against, or property or contractual rights of any kind in the goods or tangible items that were subject of the violations; (b) any and all interest in, security of, claim against, or property or contractual rights of any kind in tangible property that was used in the export or attempt to export that was the subject of the violations; and (c) any and all property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations.

Substitute Asset Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 13, United States Code, Section 305; Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



Lucy Mitchell

FOREPERSON



Audrey Strauss
United States Attorney

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v.

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Defendant.

SUPERSEDING INDICTMENT

S1 19 Cr. 752 (JMF)

(18 U.S.C. §§ 371, 553(a)(1), 2312,
2313, and 2; 13 U.S.C. § 305.)

AUDREY STRAUSS
United States Attorney


Foreperson

Superseding Indictment
filed 9/14/21 before OTW

